

Application No. 09/867,303  
Amendment "B" dated May 12, 2005  
Reply to Office Action mailed February 8, 2005

### REMARKS

The Final Office Action, mailed February 8, 2005, considered and rejected 1-26 under 35 U.S.C. 103(a) as being unpatentable over the "Universal Plug and Play Device Architecture" document, which is cited in the Applicants' IDS of 5/23/2003, and also over Kekic et al. (U.S. Patent No. 6,272,537).<sup>1</sup>

By this paper, claims 1-26 have been cancelled, such that the rejections of record are now moot. By this paper, claims 27-54 have also been added<sup>2</sup>, such that claims 27-54 now remain pending for examination, and of which claims 27 and 43 are the only independent claims at issue.

As reflected in the claims listing above, the claims are generally directed to embodiments corresponding to a generic user control point tool for discovering, controlling, and displaying Universal Plug and Play (UPnP) devices on a system.

As recited in claim 27, the generic user control point tool comprises:

a user interface that displays, in a first window, a plurality of selectable search type options that correspond to different types of searches for discovering UPnP devices on the system, wherein in response to user selection of any of the selectable search type options, the generic user control point tool collects UPnP device information that is displayed as a list of selectable UPnP devices at the user interface.

This is clearly neither taught nor suggested by the art of record. In particular, the interface (MIB browser) taught in Kekic clearly fails to describe or suggest such a user interface that displays different selectable search type options and that in response to user selection of one of the search type options collects UPnP device information that is displayed as a list of selectable UPnP devices at the user interface. In contrast, the interface (3600) shown in Figure 36 of Kekic, appears to require a MIB file name to either be selected from a menu that is activated by button 3604 or it must be typed into field 3606 prior to loading a MIB tree. Col. 51, ll. 43-67.

<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

<sup>2</sup> Support for the new claims is derived throughout the specification and drawings and previously presented claims.

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The other cited art also fails to teach or suggest such a generic user control point tool having an interface as recited in the claims. In fact, with regard to the other cited art, the Examiner has stated: "Additionally, the UPnP architecture document does not explicitly describe user interface features for discovering and controlling such devices." (Page 10, last action).

Independent claim 43 is also distinguished from the art of record for at least the same reasons. In particular, claim 43 is directed to a corresponding method for discovering, controlling, and displaying Universal Plug and Play (UPnP) devices on a system using a generic user control point tool user interface. As recited the method comprises:

- displaying a user interface with the generic user control point tool in a first window;
- displaying at the user interface a plurality of selectable search type options that correspond to different types of searches for discovering UPnP devices on the system;
- in response to user selection of any of the selectable search type options, collecting UPnP device information corresponding to compliant UPnP devices on the system; and
- displaying the compliant UPnP devices in a selectable list at the user interface.

The cited art also clearly fails to teach the other embodiments recited in the dependent claims, particularly when considering they must be considered in combination with the elements recited in the corresponding independent claims.

For example, the cited art fails to teach or suggest that, in combination with the foregoing, that:

(as per claim 44) the plurality of selectable search type options include a find by type search option for searching by type of UPnP device, a find by unique device name (UDN) search option for finding UPnP devices by unique name and an asynchronous search option for finding all UPnP compliant devices on the system;

(as per claim 45) collecting UPnP device information includes sending a multicast discovery message to UPnP devices with search criteria;

(as per claim 46) compliant UPnP devices on the system respond to the multicast message when embedded devices or services of the compliant UPnP devices match the search criteria included in the multicast discovery message;

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(as per claims 47) displaying a selectable properties button, at the user interface, corresponding to properties of UPnP devices, and displaying properties corresponding to a selected UPnP device, in a separate window (claim 48), when the selected UPnP device is selected from the list and when the selectable properties button is selected;

(as per claim 49) displaying a list of services available to the selected UPnP device, when the selectable properties button is selected, and displaying a URL to a service description document when information is available for the services of the selected UPnP device in the service description document.

(as per claim 50) displaying a selectable view service description button that, when selected, causes the generic user control point tool to open a service description viewer window, for browsing the service description document, the service description viewer window being different than first window used to display the user interface.

(as per claim 51) displaying a query button that, when selected, causes the user interface to determine and display a value associated with a selected variable corresponding to a service selected from the list of services, and displaying a selectable list of variables from which the selected variable is selected.

(as per claim 52) displaying an invoke action button, displaying a selectable list of actions corresponding to a service selected from the list of services, invoking a selected action in response to user input selecting one of the actions and the invoke action button, and displaying arguments (claim 53) corresponding to the selected action;

The cited art also fails to consider that generic user control point tool also provides the flexibility to the user of actually using the manufacture's presentation interface rather than or in addition to the generic user interface provided by the control point tool in the manner contemplated by the present invention, (as per claim 54) wherein a browser is loaded and used to subsequently load a UPnP device manufacture's presentation user interface when a presentation button that is displayed by the generic user control point tool interface is selected.

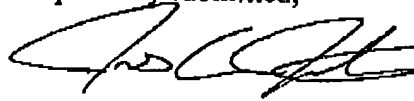
For at least the foregoing reasons, Applicants respectfully submit that the pending claims 27-54 are neither anticipated by nor made obvious in view of the cited art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

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Dated this 12<sup>th</sup> day of May, 2005.

Respectfully submitted,



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